



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7

11201 Renner Boulevard
Lenexa, Kansas 66219

JAN 17 2013

Mr. Glen Schwartz
Mile Rail, LLC
8116 Wilson Road
Kansas City, Missouri 64125

RE: Comments on the PCB Characterization Work Plan Addendum Dated January 2, 2013 for the
Former GST Steel Facility Site

Dear Mr. Schwartz:

The United States Environmental Protection Agency has reviewed the subject document and is providing the following comments to be incorporated in a revised Site Characterization Work Plan.

1. The Title of the Work Plan is misleading, as this is only a site characterization work plan. A Remediation and confirmation sampling work plan addendum will be required for submittal and approval in accordance with the Code of Federal Regulation (CFR) 761.61 (c) prior to implementation of remediation.
2. Section 2.1.3, Vault Samples: It is recommended that the characterization be conducted in two phases; First characterize the backfill and concrete vault lid in-situ. Only after determining the level of PCB contamination in the vault lid and backfill should stockpiling these materials be considered. If sampling results confirm PCB contamination is less than 1 part per million (ppm), on-site stockpiling can be performed without a concern for spreading PCB-contamination to the ground surface. If sampling results confirm that the vault cover and backfill soil are contaminated with PCBs at or above 1 ppm, these materials should be placed in TSCA-approved storage and shipping containers, and not be stockpiled on the ground. This will eliminate the potential spread of PCB contamination.
3. Section 2.1.3, Vault Samples: Discrete samples are recommended for characterizing the backfill and vault cover materials in lieu of the proposed composite sampling due to the relative closeness of the analytical method detection limit to the 1 ppm action level. In addition, discrete sampling will result in the delineation of smaller volumes of potentially contaminated media, thereby reducing potential disposal costs should PCBs be detected above 1 ppm.
4. Section 2.4, Exclusion Zone: Exclusion zones and decontamination areas should be delineated on a figure and referenced in this section.
5. The dimensions of the concrete vault should be provided in the text and delineated on Figure 1.

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I can be reached at (913) 551-7755, if you have any questions concerning these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce Morrison". The signature is fluid and cursive, with the first name "Bruce" and last name "Morrison" clearly distinguishable.

Bruce Morrison
Project Manager
Waste Remediation and Permitting Branch
Air and Waste Management Division

cc: Mark L. Finney, Shaw Environmental, incorporated